

THE ROSEN LAW FIRM, P.A.

Laurence M. Rosen, Esq.
One Gateway Center, Suite 2600
Newark, NJ 07102
Telephone: (973) 313-1887
Facsimile: (973) 833-0399
Email: lrosen@rosenlegal.com

Co-Lead Counsel for Plaintiffs

[Additional Counsel on Signature Page]

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE BED BATH & BEYOND
STOCKHOLDER DERIVATIVE
LITIGATION

Master File No. 2:20-cv-08673-MCA-
MAH

**STIPULATION AND ORDER TO
EXTEND DEADLINE**

WHEREAS, starting on July 10, 2020, three related shareholder derivative actions were filed in this Court on behalf of nominal defendant Bed Bath & Beyond Inc. (“BBBY”); and

WHEREAS, on October 14, 2020, the Court entered an order [ECF No. 12] consolidating the three cases under the caption shown above; and

WHEREAS, on August 3 and 4, 2021, the parties participated in a mediation to try to resolve the matter, but did not succeed in doing so at that time; and

WHEREAS, on January 4, 2022, Defendants and BBBY moved to dismiss the consolidated action [ECF No. 27]; and

WHEREAS, the parties have entered into a settlement in principle of the instant action and are in the process of documenting the settlement agreement in writing, and

WHEREAS, on March 31, 2022, the Court granted the parties' request to extend the deadline for Plaintiffs' response to the motion to dismiss to April 14, 2022 [ECF No. 31]; and

WHEREAS, the parties are continuing to work on settlement documentation and desire an adjournment of Plaintiffs' time to respond to the motion to dismiss to allow the parties to attempt to finalize the settlement documentation;

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs, Defendants, and Nominal Defendant BBY that:

1. Plaintiffs' time to respond to the Defendants' Motion to Dismiss is hereby adjourned from April 14, 2022 to May 18, 2022.

Dated: April 13, 2022

/s/ Laurence M. Rosen

Laurence M. Rosen
The Rosen Law Firm, P.A.
One Gateway Center, Suite 2600
Newark, NJ 07102
Tel: (973) 313-1887
Fax: (973) 833-0399
Email: lrosen@rosenlegal.com

/s/ Benjamin I. Sachs-Michaels

Benjamin I. Sachs-Michaels
Glancy Prongay & Murray LLP
712 Fifth Avenue, 31st Floor
New York, NY 10019
Tel: (212) 935-7400
Email: bsachsmichaels@glancylaw.com

Co-Lead Counsel for Plaintiffs

/s/ Edna D. Guerrasio

Edna D. Guerrasio
Jonathan E. Richman (*pro hac vice*)
Proskauer Rose LLP
11 Times Square
New York, NY 10036
Tel: (212) 969-3000
Fax: (212) 969-2900
Email: eguerrasio@proskauer.com
jerichman@proskauer.com

*Attorneys for Defendants and Nominal
Defendant Bed Bath & Beyond Inc.*

SO ORDERED this 14th day of April, 2022.



Hon. Madeline Cox Arleo
United States District Judge